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moorhead, mn 56560

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wahpeton, nd 58075

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February 6, 2006

Ms. Marlene H. Dortch
Office of the Secretary Federal Communications Commission
44512 th Street, SW
Washington, DC 20554

Re: EB-06-TC-060, Certification of CPNI Filing 2006

Dear Ms. Dortch:

This letter serves as our "Certification of CPNI Filing 2006", as ordered in EB-06TC-060.

VAL-ED Joint Venture LLP dba 702 Communications
702 Main Avenue
Moorhead, MN 56560

As a corporate officer of these companies, I hereby certify that, based on my personal knowledge, the Company has established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information" ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 et sep., as revised.

The attached Statement demonstrates such compliance.



Company Officer

Dated: 2-6-06

Attachment

cc: Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau,
Federal Communications Commission, Room 4-A234, 445 12" Street, SW, Washington,
DC 20554
Best Copy and Printing, Inc., Portals II, 445 12th Street, SW, Washington, DC 20554

**STATEMENT OF COMPLIANCE PROCEDURES for
CUSTOMER PROPRIETARY NETWORK INFORMATION**

- A. *Establishment of customer approval.*
 - a. Beginning in August 2005 and every other August thereafter, the attached opt-out notice, Attachment A, will be included in the customer's bill.
 - b. All new customers will be required to consent or reject to the use of their CPNI at the time of application for service. A written signature on the letter of agency serves as verification. The detailed opt-out notice, Attachment A, will be mailed in new customer welcome letters as a further courtesy notice.
- B. *Training of company personnel.*
 - a. All customer service, retail sales and marketing personnel were trained regarding the purpose of CPNI and its requirements in August 2005. A refresher will be held every other August thereafter and the topic will also be included in orientation training materials for new hires in these positions. Failure of any staff member to seek approval and/or comply with CPNI guidelines will be subject to disciplinary action pursuant to Company Guidelines – Confidentiality Section 22.
- C. *Maintenance of CPNI use or disclosure.*
 - a. The President must give prior approval for any sales/marketing campaigns which plan to utilize CPNI.
 - b. The Market Manager shall be responsible to maintain records for any sales/marketing campaigns which utilize CPNI.
 - c. The President shall be responsible to approve and maintain record of any instance where CPNI is disclosed to a joint venture partner or independent contractor for the specific purpose of marketing or providing the communications-related services for which that CPNI has been provided.
 - d. The President shall be responsible for a review process of the compliance with CPNI rules in August 2005 and every two years thereafter.

ATTACHMENT A

NOTICE REGARDING USE OF CUSTOMER PROPRIETARY NETWORK INFORMATION

Under Federal law, a customer of telecommunications services has a right, and a provider of telecommunications services has a duty, to protect the confidentiality of Customer Proprietary Network Information (CPNI). CPNI is individual customer information relating to the quantity, technical configuration, type, destination, location or amount of use of a telecommunications service by the customer. It also includes information contained in bills pertaining to local or long distance telephone service a customer receives.

702 Communications wants to improve its ability to offer you, its customer, products and services tailored to your telecommunications needs. In order to do this, 702 Communications intends to use CPNI to identify telecommunications products and services it can provide to you that you may not currently receive. 702 Communications will not share your CPNI with any other company or organization, except to public safety 911 records, unless you make a written request to do so.

You have the right to disapprove 702 Communications' proposed use of CPNI, and to deny or withdraw 702 Communications' access to CPNI at any time.

In order to deny or withdraw 702 Communications' access to your CPNI, you must notify 702 Communications by calling your local 702 Office at 218-284-5702 in Moorhead or 701-672-5702 in Wahpeton or emailing us at cpni@702com.net and indicate that you are withdrawing your approval of our use of your CPNI. Your choice to deny or withdraw 702 Communications' access to your CPNI will remain in effect until you revoke that denial. If you do not notify 702 Communications before September 15, 2005 that you choose to deny its access to your CPNI, then 702 Communications may use your CPNI in order to identify telecommunications products and services it can provide to you that you do not currently receive.

If you choose to deny or withdraw 702 Communications' access to your CPNI, it will not affect 702 Communication's provision to you of any services to which you already subscribe. You will not receive company information from us at that point. You may miss the opportunity to learn of new service offerings, new packages that could reduce your monthly bill, new lower rates on services such as long distance and other information that keeps you informed of the happenings of your local telephone company. If you have additional questions or require further information, please contact us a 218-284-5702 in Moorhead or 701-672-5702 in Wahpeton or email us at cpni@702com.net.